

EXHIBIT A

1 UNITED STATES BANKRUPTCY COURT

2 SOUTHERN DISTRICT OF NEW YORK

3 Case No. 08-01789-smb

4 - - - - - x

5 SECURITIES INVESTOR PROTECTION CORPORATION,

6 Plaintiff,

7 v.

8 BERNARD L. MADOFF INVESTMENT SECURITIES, L.L.C.,

9 Defendants.

10 - - - - - x

11 Adv. Case No. 10-04292-smb

12 - - - - - x

13 IRVING H. PICARD, TRUSTEE FOR THE LIQUIDATION OF BERNARD L.

14 MADOFF INVESTMENT SECURITIES LLC,

15 Plaintiff,

16 v.

17 ROBERT ROMAN,

18 Defendants.

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1 U.S. Bankruptcy Court
2 One Bowling Green
3 New York, NY 10004
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5 June 29, 2017
6 11:02 AM
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21 B E F O R E :

22 HON STUART M. BERNSTEIN

23 U.S. BANKRUPTCY JUDGE

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25 ECRO: K. SU

1 discovery they're getting because they use conclusory, we
2 didn't get this, we didn't get that. They're --

3 THE COURT: We're talking --

4 DAVID SHEEHAN: Your Honor, do you know for a fact
5 what's in those? I don't. Right?

6 THE COURT: Well, I think you should look at them.

7 DAVID SHEEHAN: I know I've looked at 27 terabytes
8 of data and I know that there's no evidence of trading that
9 this woman keeps talking about that we've been hiding. And
10 she hasn't presented one iota of evidence to suggest to you
11 that that's true, other than conclusions.

12 THE COURT: So you're -- but then you can't tell
13 me whether or not these microfilms are relevant or not if
14 you haven't looked at them.

15 DAVID SHEEHAN: No, we've looked at them enough to
16 do searches of them, but we have -- and can I say what I --

17 THE COURT: Let me ask you a question.

18 DAVID SHEEHAN: Yes.

19 THE COURT: What's involved in just producing the
20 information? Maybe I don't understand.

21 DAVID SHEEHAN: Well, it's going to be a lot of
22 time and effort, a lot of money.

23 THE COURT: What's involved? I mean --

24 DAVID SHEEHAN: Well, I would say it's a -- it
25 took half a million dollars to do 300 --

1 DAVID SHEEHAN: It sounds easy.

2 THE COURT: All right.

3 DAVID SHEEHAN: But we've been doing that for a
4 year and a half with Ms. Chaitman.

5 MS. CHAITMAN: That is untrue.

6 THE COURT: No, no, stop. I don't know what's in
7 there, you don't know what's in there, and on that basis,
8 you can't say I'm not going to turn it over.

9 DAVID SHEEHAN: Yeah, but she hasn't shown to you
10 what she's saying is true.

11 THE COURT: There are two orders directing you --

12 DAVID SHEEHAN: But why does she get discovery
13 when she can't even prove what she's saying?

14 THE COURT: There are two orders directing you to
15 turn over the documents. You haven't told me that they're
16 not relevant. You --

17 DAVID SHEEHAN: I'm going to look at it, and if I
18 don't think they are, I'm going to tell Your Honor that.

19 THE COURT: You haven't made a motion for a
20 protective order, and there are two orders to turn over the
21 documents.

22 DAVID SHEEHAN: I'd like the protective order.
23 Well, I do.

24 MS. CHAITMAN: Well, Judge, you know --

25 DAVID SHEEHAN: It's about time she put up or shut